

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of

Restoring Internet Freedom

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) WC Docket No. 17-108

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COMMENTS OF THE FILIPINA WOMEN'S NETWORK

July 10, 2017

The Filipina Women's Network ("FWN") respectfully submits the following comments in the Restoring Internet Freedom docket (WC Docket No. 17-108). FWN strongly supports the Commission's efforts to roll back overregulation of the Internet, and urges the Commission to repeal the reclassification of ISPs as common carriers in order to spur investment in the broadband networks that our community relies on.

FWN is concerned about our and other communities' access to an expanding internet that keeps pace with the needs of consumers, workers and entrepreneurs. We also have a vested interest in the internet remaining a hub of free expression, activism and representation of minority voices who, before the explosion of internet connections, online tools and social media networks, never had a fair chance to be heard.

That is why we were deeply concerned with the FCC's 2015 decision to reclassify internet service providers (ISPs) as common carriers, and are paying close attention to the "Restoring Internet Freedom" proceeding. The "light-touch" regulatory environment in place before the 2015 Order encouraged the transformative wired and wireless networks and world-changing communication services on the internet that FWN members use to raise our sisters up day after day. We are troubled by the thought that the sisterhood we've fostered might have been curtailed if ISPs had thought they could be burdened with utility-style regulations, or not be regulated on a level playing field with other internet companies.

In Docket 17-108, "Restoring Internet Freedom," FWN also files the enclosed op-ed stating our view that "classifying ISPs as Title II carriers was a misguided attempt to implement net neutrality by fiat." In this op-ed, we also implore Congress to find a bipartisan, permanent solution to the net neutrality debate.

Regardless of if or when that legislative solution comes, FWN applauds the Commission for starting the job of ensuring net neutrality principles without the hindrance of heavy-handed or outdated regulation.

Filipina Network Supports Congress Setting Net Neutrality Rules

MARILY MONDEJAR | MAY 16, 2017 | 05:00 AM

Accessing the internet in a place where it was previously unavailable, or accessing high-speed internet where there was once only dial-up, is an incredibly empowering experience. Robust access to the internet helps minorities and entrepreneurs — such as Filipina women like me — to engage with each other and the world, start businesses, cultivate ideas and share stories.

This kind of empowerment is at the heart of the Filipina Women's Network, an ever-growing association of Filipina leaders and policymakers who have created a global network to give our community a stronger voice. I started FWN years ago after being inspired to change people's perceptions, and the online representations, of Filipina women as “exotic” objects. Today, FWN is a sisterhood connected from all over the United States, Bangladesh, Belgium, Canada, Dubai, Hong Kong, Israel, Latin America, Norway, the Philippines, Singapore and Switzerland.

Keeping our far-flung members informed on issues that affect us, our families and our kids is not always easy, with some living in places that do not enjoy the same internet freedoms that we in the United States do. Networks like FWN that lean so heavily on social media and messaging applications to organize, resist and empower rely heavily on a stable, fair and innovative internet — without one, we'd have no means by which to engage our Filipina sisters in the diaspora about women's rights and educational programs.

That is why the core principles of net neutrality are so vital. Net neutrality is a concept that can be hard to pin down, but it essentially represents the preservation of the freedoms Americans currently enjoy, and have always enjoyed, online. All major internet service providers and internet companies agree on the core of this issue: ISPs should never slow down or block services and websites consumers access over the internet.

A better, faster and more widely accessible internet is necessary for communities like ours to access economic and civic opportunities, as well as to share our culture and perspectives with the world. But the Federal Communications Commission's 2015 decision to classify ISPs as “Title II” carriers puts in jeopardy the future expansion of a robust, easily accessible internet to places in the United States where it isn't currently available.

Classifying ISPs as Title II carriers was a misguided attempt to implement net neutrality by fiat. It has led to regulatory uncertainty where the “rules of the road” for ISPs can

fluctuate with each new presidential administration. Title II classification has inserted government regulations where they are not needed, stifling expanded investment and innovation with complex and overreaching rules.

As Pat Fong Kushida, president and CEO of the CalAsian Chamber of Commerce [warned](#) prior to its implementation, the Title II ruling would be “a body blow to the internet economy and the jobs and investment it produces.” In February, FCC Chairman Ajit Pai [made similar remarks](#) to the Mobile World Congress in Barcelona, Spain: “After the FCC embraced utility-style regulation, the United States experienced the first-ever decline in broadband investment outside of a recession.” In the year-and-a-half since reclassification, the many warnings about its negative impacts have come to pass, with ISP investment in the United States [dropping](#) 5.5 percent in 2016 compared to 2014 levels.

I believe ISPs and all other internet companies need to play by the same rules. And as I have [stated](#) before, I agree that a set of basic, codified principles for net neutrality is necessary for a flourishing internet economy. But legislation in Congress is the better way forward. Not only would this approach provide regulatory stability, it would prevent unnecessary government intervention in the private marketplace.

There is no question that the principles of net neutrality are vital. But these principles need to be codified in federal law so that there is an enduring and transparent regulatory framework in place to help foster broadband investment and innovation and ensure fairness online. Utility-style regulation of the internet won’t cut it for broadband access and innovation that allows for quick deployment of fiber, new developments of high-speed wireless networks and cutting-edge solutions to reach underserved Americans. Congress should act swiftly to enact net neutrality legislation and help ensure a stable, fair and open internet for decades to come.

Marily Mondejar is founder and CEO of the Filipina Women’s Network.

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